



250 Vesey Street  
27th Floor  
New York, NY 10281

wmhlaw.com  
T: 212-335-2030  
F: 212-335-2040

June 24, 2024

**BY ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl St # 1040  
New York, NY 10007

**Re: *United States v. Laura Perryman*, No. 23-CR-0117-DLC**

Dear Judge Cote:

We write to respectfully request that the Court enter an Order approving *in forma pauperis* status for Laura Perryman, who does not have the funds to pay for appellate counsel, so that she may receive appointed counsel for her appeal. In support of this motion is a CJA Form 23 that Ms. Perryman has prepared.

On June 17, 2024, this Court sentenced Ms. Perryman to 72 months in prison and entered judgment in this matter. ECF No. 137. We are today filing a notice of appeal in this Court on Ms. Perryman's behalf. We have paid the \$605.00 filing fee on Ms. Perryman's behalf with our funds so she can proceed with her appeal.

We were not retained to represent Ms. Perryman for her direct appeal. We intend to file a motion in the Second Circuit to be relieved as attorney of record and for the Federal Defenders of New York to represent Ms. Perryman on appeal. We have spoken with Barry Liewant, Attorney-in-Charge of the Appeals Unit of the Federal Defenders, and he has indicated that the Federal Defenders would like to be assigned to handle the appeal. We are not aware and Mr. Liewant is not aware of any conflicts that would prevent this assignment. We are moving here for *in forma pauperis* status because we understand we must do so before moving in the Second Circuit to be relieved as attorney of record for the appeal.

Grav. H. d.

Denise Cote  
6/25/24

Accordingly, we respectfully request that the Court enter an Order approving *in forma pauperis* status for Ms. Perryman so that counsel may be appointed to represent her in the Second Circuit. The Government advises that it takes no position on this request.

Respectfully submitted,

*/s/ Derek A. Cohen*

---

Derek A. Cohen  
Sean T. Haran  
Johnson Lin  
Jennifer Berger (admitted pro hac)  
*Attorneys for Laura Perryman*

CC: Counsel for the Government (via ECF)  
Barry Liewant (via email)

CJA-23  
(Rev 3/21)

Case 1:23-cr-00117-DLC Document 144 Filed 06/25/24 Page 1 of 1

**FINANCIAL AFFIDAVIT**

IN SUPPORT OF REQUEST FOR ATTORNEY, EXPERT, OR OTHER SERVICES WITHOUT PAYMENT OF FEE

IN THE UNITED STATES ☐ DISTRICT COURT ☒ COURT OF APPEALS☐ OTHER (Specify Below)

IN THE CASE OF

FOR

LOCATION  
NUMBER

United States v. Laura Perryman

AT

PERSON REPRESENTED (Show your full name)

Laura Perryman

- 1 ☐ Defendant - Adult  
 2 ☐ Defendant - Juvenile  
 3 ☒ Appellant  
 4 ☐ Probation Violator  
 5 ☐ Supervised Release Violator  
 6 ☐ Habeas Petitioner  
 7 ☐ 2255 Petitioner  
 8 ☐ Material Witness  
 9 ☐ Other (Specify) \_\_\_\_\_

**DOCKET NUMBERS**

Magistrate Judge

District Court

23-cr-0117

Court of Appeals

CHARGE/OFFENSE (Describe if applicable &amp; check box→)

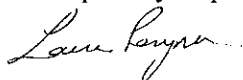
☒ Felony☐ Misdemeanor

18 U.S.C. § 1349; 18 U.S.C. §§ 2, 1347

**ANSWERS TO QUESTIONS REGARDING ABILITY TO PAY**

<b>INCOME &amp; ASSETS</b>	<b>EMPLOYMENT</b>	Do you have a job? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		IF YES, how much do you earn per month? <u>zero</u>	
		Will you still have a job after this arrest? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown	
	<b>PROPERTY</b>	Do you own any of the following, and if so, what is it worth?	
		<b>APPROXIMATE VALUE</b>	<b>DESCRIPTION &amp; AMOUNT OWED</b>
	Home	\$ <u>N/A</u>	
	Car/Truck/Vehicle	\$ <u>N/A</u>	
	Boat	\$ <u>N/A</u>	
	Stocks/bonds	\$ <u>N/A</u>	
	Other property	\$ <u>N/A</u>	
	<b>CASH &amp; BANK ACCOUNTS</b>	Do you have any cash, or money in savings or checking accounts? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		IF YES, give the total approximate amount after monthly expenses \$ <u>0</u>	
<b>OBLIGATIONS, EXPENSES, &amp; DEBTS</b>	How many people do you financially support? <u>self</u>		
	<b>BILLS &amp; DEBTS</b>	<b>MONTHLY EXPENSE</b>	<b>TOTAL DEBT</b>
	Housing	\$ 1371	\$ _____
	Groceries	\$ 400	\$ _____
	Medical expenses	\$ 0	\$ _____
	Utilities	\$ 120	\$ _____
	Credit cards	\$ 566	\$ 18,328.27
	Car/Truck/Vehicle	\$ N/A	\$ _____
	Childcare	\$ N/A	\$ _____
	Child support	\$ N/A	\$ _____
	Insurance	\$ N/A	\$ _____
	Loans	\$ N/A	\$ _____
	Fines	\$ N/A	\$ _____
	Other	\$ N/A	\$ _____

I certify under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF DEFENDANT  
(OR PERSON SEEKING REPRESENTATION)

6/20/2024

Date